



November 18, 2011

Via Electronic Delivery Submission: ken.sandler@gsa.gov

Mr. Ken Sandler
Designated Federal Official
Office of Federal High-Performance Green Buildings
Office of Governmentwide Policy
General Services Administration
1275 First Street, NE, Room 633D
Washington, D.C. 20417

Re: The Society of the Plastics Industry, Inc. Comments to the Green Building Advisory Committee (the Committee) to the General Services Administration (GSA), and to GSA, following the Committee meeting held November 9, 2011

Dear Mr. Sandler:

The Society of the Plastics Industry, Inc. (SPI) understands an opportunity for additional public comment was extended following the first meeting of the Green Building Advisory Committee (the Committee) to the General Services Administration (GSA), held on November 9, 2011 [76 FR 65511; October 21, 2011]. SPI appreciates the opportunity to provide comments to both the Committee and GSA, concerning activities of the Committee and its advisement of GSA, in consideration of green building standards programs to be used by federal agencies.

Founded in 1937, SPI is the plastics industry trade association representing the third largest manufacturing industry in the United States. SPI's member companies represent the entire plastics industry supply chain, including processors, machinery and equipment manufacturers and raw materials suppliers. The U.S. plastics industry employs nearly 1 million workers and provides nearly \$327 billion in annual shipments.

SPI supports the goal of federal buildings becoming more energy efficient and incorporating sustainable design standards. Our members manufacture a range of products that will help federal agencies achieve this goal. SPI offers several comments for consideration by GSA as the Agency considers endorsement of potential standards programs.

1. The Program Should Provide Flexibility To Choose The Green Building Rating System That Best Fits The Agency's Needs

SPI recognizes that there are multiple green building rating systems currently available and additional systems may be developed. SPI recommends that agencies be provided the flexibility to choose the green building rating system that best fits their needs.

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One size does not fit all. By providing rating system options, agencies can select and implement the system that is most appropriate and applicable to meet their needs. Accordingly, we agree with establishing minimum criteria for any system that a federal agency would choose to use to green rate a building. This approach recognizes that a diversity of systems will promote competition among existing and developing systems that will lead to improvements that benefit all system users, including federal agencies.

2. The Program Should Be Limited To Certification Systems Developed In An Open, Consensus-Based Process

In August 2010, SPI submitted comments commending DOE for its proposal (Department of Energy (DOE) Energy Efficiency and Sustainable Design Standards for New Federal Buildings (*75 Fed. Reg.* 29933 (May 28, 2010) and *75 Fed. Reg.* 34657 (June 18, 2010); EE-RM/STD-02-112; RIN 1904-AC13 (the Proposal)) that if an agency were to choose to green rate a building then the green rating system would be required to “be developed by a certification organization that (i) provides an opportunity for public comment on the system; and (ii) provides an opportunity for development and revision of the system through a consensus- based process.”

Development of a standard through a consensus-based process provides transparency and ensures the opportunity for meaningful participation by all groups that will be impacted. A true consensus process also has procedures to ensure balance, consideration of dissenting views, and appeals procedures. The American National Standards Institute (ANSI) is the coordinator of the U.S. standards process and provides strict objective requirements for accreditation of those processes. A credible rating system must be developed using a process that embodies the elements of consensus as defined by ANSI.

Organizations such as the Green Building Institute (GBI) have worked to ensure that its activities such as standard, ANSI/GBI 01-2010: A Green Building Protocol for Commercial Buildings, was developed using the ANSI process. In addition, 2008 the National Association of Home Builders and the International Code Council (ICC) launched the ICC-700-2008 Green Building Standard. It is the only residential green building certification standard to have been developed through an ANSI accredited process.

In fact, the National Technology Transfer and Advancement Act of 1995, Pub. L. 104-113 and OMB circular A-119 provide that federal agencies “shall use technical standards that are developed or adopted by voluntary consensus standard bodies,” unless the standard is “inconsistent with applicable law or otherwise impracticable.”

SPI emphasizes the importance of a process such as ANSI when developing standards to ensure openness, balance, consensus and due process. We request GSA, like DOE, support that any standards forthcoming will be developed and revised through a consensus-based process.

3. The Program Should Recognize Multiple Systems To Promote Competition

Over the past several years, the market for green building rating systems has become increasingly competitive which has driven innovation, lowered costs and improved our shared environment. Since the

GBI was launched at the end of 2004 it has helped spur numerous advances in building certification systems. For example, from the beginning Green Globes U.S., which GBI owns and operates, has been a completely web based interactive system. Over the last few years, the U.S. Green Building Council (USGBC) has begun to take advantage of web-based communication, moving to allow submission of some of its documentation on-line.

Green Globes also has always used a Life Cycle Assessment (LCA) as part of its program. GBI has even developed a tool called the *Green Globes® LCA Credit Calculator for Building Assemblies* and has allowed a generic version of the tool to be made available to federal agencies and the public through the Athena Sustainable Materials Institute as the *ATHENA® EcoCalculator for Assemblies*. We support Green Globes U.S. as you review potential standards programs.

Similarly, USGBC has begun a process to incorporate LCA into LEED and has undertaken a pilot project as part of that initiative. While there is no current timetable available from USGBC, the pilot is intended to eventually award buildings with points based on favorable LCA scores instead of a number of the currently available LEED credits. These examples demonstrate the importance of allowing competition to help improve green building related systems.

In closing, SPI urges GSA to include multiple, consensus-based and developed green building systems as part of the choices available to agencies when constructing new federal buildings or undergoing major renovations of federal buildings.

We appreciate this opportunity to provide you with our views on this important issue and would be pleased to answer any further questions you may have. If you have any questions or require additional information, please contact me, Terry Peters at 202.974.5280 or TPeters@plasticsindustry.org.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Terry Peters". The signature is stylized with a large, sweeping initial "T" and "P".

Terry Peters
Senior Director
Technical and Industry Affairs
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